



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

September 28, 2016

Sent electronically to Stephanie Viskovich "viskovich2016@gmail.com"

Subject: Complaint filed by Gerald Pollet and Janet Miller, PDC Case 7697

Dear Ms. Viskovich:

Enclosed is a copy of a letter sent to Gerald Pollet concerning a complaint he filed with the Public Disclosure Commission (PDC) on July 18, 2016. The complaint alleged that your 2016 Campaign, the People for Stephanie Viskovich, violated RCW 42.17A.235 and .240 by: (1) failing to disclose contributions received on the Monetary Contribution reports (C-3 reports); and (2) failing to disclose expenditures made and other campaign-related activities on the Campaign Summary Contributions and Expenditures report (C-4 report). A copy of the complaint was previously provided to you.

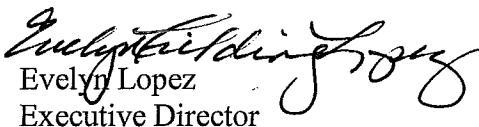
As noted in the letter to Representative Pollet, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

In accordance with WAC 390-37-060(1)(b), this letter constitutes a Formal Written Warning as part of PDC staff practice to issue a warning for first-time minor violations of PDC reporting requirements, especially for first-time candidates. This letter serves to warn you that your failure to timely file C-3 and C-4 reports, and the failure to timely deposit campaign contributions within five business days of receipt for the remainder of the 2016 election, could result in future enforcement action before the Commission.

Finally, concerning the GoFundMe contributions, PDC is advising your Campaign to transfer those contributions into the campaign bank account and file a C-3 report disclosing those contributors prior to the 2016 general election being held.

If you have questions, please contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,


Evelyn Lopez
Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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September 28, 2016

Sent electronically to State Representative Gerry Pollet "info@gerrypollet.com"

Gerald Pollet
7750 17th Avenue NE
Seattle WA 98115

Subject: Complaint filed against Stephanie Viskovich, PDC Case 7697

Dear Representative Pollet:

Public Disclosure Commission (PDC) staff has completed our review of the complaint received on July 18, 2016 against Stephanie Viskovich, a 2016 candidate for State Representative in the 46th Legislative District. The complaint and additional information provided by you and your Campaign Treasurer, Janet Miller alleging that the People for Stephanie Viskovich violated RCW 42.17A.235 and .240 by failing to disclose contributions received on the Monetary Contribution reports (C-3 reports), and expenditures made and other campaign-related activities on the Summary Contributions and Expenditures report (C-4 report).

Your complaint was considered in light of the following statutes:

RCW 42.17A.235 and .240 requires all candidates appearing on the 2016 primary and/or general election ballots, to timely file C-3 reports every Monday on a weekly basis beginning June 1, 2015, disclosing monetary contributions that were received and deposited in the previous five business days, and to timely file C-4 reports on 21, 7-day, and Post-Election primary and general election C-4 reports disclosing contribution and expenditure activities undertaken by the candidate.

PDC staff reviewed your complaint and attachments, responses and email communications from Ms. Viskovich, and the C-3 and C-4 reports filed by the People for Stephanie Viskovich Campaign (Campaign). As a result of our investigation, we found the following:

- On May 19, 2016, Ms. Viskovich filed a Candidate Registration (C-1 report) declaring her candidacy for State Representative in the 46th Legislative District, Position No. 1 for 2016, selecting the Full Reporting option, and listing herself as Treasurer. Ms. Viskovich was a first time candidate for public office in 2016.
- Ms. Viskovich was one of two candidates that appeared on the August 2, 2016 Primary election ballot, so she will be appearing on the November 8, 2016 general election ballot.

- On July 20, 2016, the Campaign filed four C-3 reports totaling \$2,167 that disclosed:
 1. A \$900 contribution was received from LDLM Management, LLC on May 15, 2016, and deposited on May 24, 2016. The contribution was disclosed 40 days late.
 2. \$167 in anonymous contributions were received on June 4, 2016, and a \$100 contribution was received on June 13, 2016 and all \$267 in contributions received deposited on June 15, 2016. The contributions were disclosed 30 days late.
 3. A \$1,000 contribution was received on June 18, 2016, and deposited on June 22, 2016. The contribution was disclosed 40 days late.
- On July 20, 2016, the Campaign filed two C-4 reports, the initial C-4 report covering the period of May 15-31, 2016, and the 21-day Pre-Primary Election C-4 report. Both C-4 reports were filed late and disclosed that no contributions had been received and no expenditures made.
- On July 24, 2016, the Campaign filed an amended May and 21-day Pre-Primary C-4 report. The amended May 2016 C-4 disclosed the receipt of the \$900 monetary contribution from LDLM Management, LLC and an \$83 in-kind contribution from an individual for cell phone and phone card which was disclosed 44 days late. The amended 21-day Pre-Primary C-4 report disclosed the receipt of the \$1,267 in monetary contributions and a \$10 un-itemized small expenditure which was disclosed 12 days late.
- Ms. Viskovich stated that the delay in disclosing the \$900 contribution from LDLM Management LLC was due to the Campaign bank account not being opened until the end of May, and problems in filing the C-3 and C-4 report using the Online Reporting of Campaign Activity (ORCA) software. As Treasurer, she stated that she made several attempts to file with the PDC (ORCA) software prior to the complaint being filed, but she experienced technical difficulties which required her to seek assistance from PDC staff that slowed the process down. She stated that her lack of familiarity with the ORCA software and being a first-time candidate, led to the LDLM contribution and other contribution and expenditure information being filed late.
- Ms. Viskovich stated that the GoFundMe Campaign is still active, and while pledges totaling \$590 have been made, the Campaign has not received any of the contributions for those pledges. She stated that "...all details of the persons making pledges and eventually contributions through GoFundMe as required by the PDC is available through the back end of the GoFundMe campaign website." She stated that her Campaign will disclose those contributions once the funds are transferred from GoFundMe into the campaign bank account.
- Concerning the contribution received from the Gun Owners Action League (GOAL), Ms. Viskovich stated that C-3 report filed by the Campaign listed the date received for the GOAL contributions as the date the check was written. She stated the contribution check from GOAL was written on June 30, 2016, received by the Campaign via mail on or around July 18, 2016, and deposited into the campaign bank account on July 21, 2016. Based on those facts, the Campaign timely filed C-3 report disclosing the GOAL contribution on July 24, 2016.

- Finally, the Campaign disclosed making three expenditures totaling \$531.53 for political advertisements that included posters, signs and banners that were featured in the jpeg attachments submitted along with your complaint.

No evidence was found during our review, demonstrating that the Campaign failed to disclose monetary contributions or campaign expenditures.

The Campaign failed to timely file C-3 reports and two C-4 reports, but that information was disclosed to the public prior to the primary election being held. Staff also noted that the Campaign failed to timely deposit some of the contributions disclosed on the late filed C-3 reports within the required five business days of receipt.

Finally, concerning the GoFundMe contributions PDC staff has advised the Campaign to transfer the GoFundMe contributions into the campaign bank account and file a C-3 report disclosing those contributions prior to the end of the 2016 election cycle.

In accordance with PDC practice, a warning letter is being sent to Ms. Viskovich cautioning her that: (1) the failure to timely file C-3 and C-4 reports; and (2) the failure to timely deposit campaign contributions within five business days of receipt for the remainder of the 2016 election, could result in future enforcement action before the Commission.

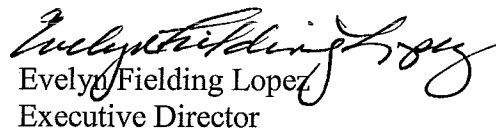
Because staff's review has not revealed sufficient evidence to establish a material violation of any laws or regulations under the Commission's jurisdiction, and the fact that Ms. Viskovich is a first-time candidate for public office in 2016, I am returning your complaint filed against Stephanie Viskovich.

If you have questions, please contact Kurt Young, PDC Compliance Officer at 360 664-8854, or toll-free at 1-877-601-2828 or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,


Kurt Young
PDC Compliance Officer

Endorsed by,


Evelyn Fielding Lopez
Executive Director

cc: Stephanie Viskovich

